IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI SOUTHERN DIVISION

DOUGLAS HANDSHOE

PLAINTIFF

VERSUS

CIVIL ACTION NO. 1:15-cv-382-HSO-JCG

VAUGHN PERRET, CHARLES LEARY & DANIEL ABEL D/B/A TROUT POINT LODGE LTD OF NOVA SCOTIA & IN THEIR INDIVIDUAL CAPACITIES PROGRESS MEDIA GROUP LIMITED, MARILYN SMULDERS, TORSTAR CORPORATION, NATIONAL GEOGRAPHIC SOCIETY, XYZ FOUNDATION & JOHN DOES 1-50

DEFENDANTS

MOTION TO WITHDRAW AS COUNSEL OF RECORD

COMES NOW, Purvis & Co. PLLC, by and through Jason B. Purvis and Jacob C. Ladnier, and file this, their Motion to Withdraw as Counsel, showing unto the Court the following:

1.

The present counsel entered their appearance on or about September 15, 2016 [Doc. #67]. Said appearance was entered as to the individual Defendants, Vaughn Perret and Charles Leary.

2.

An irretrievable conflict has arisen between Perret, Leary and Purvis & Co. PLLC, such that the firm is unable to continue in its representation and carry out its obligations as counsel of record in this case.

3.

Perret and Leary concur with this position and have requested that Purvis & Co. PLLC withdraw as counsel in this case.

WHEREFORE, PREMISES CONSIDERED, Purvis & Co. PLLC and its attorneys request that they be allowed to withdraw as counsel in this case effective September 13, 2017 and that they be relieved of all further requirements, professionally, in this matter.

RESPECTFULLY SUBMITTED, this the 19th day of September, 2017.

VAUGHN PERRET, CHARLES LEARY

BY: PURVIS & CO. PLLC

BY: /s/ Jason B. Purvis

Jason B. Purvis (MSB #100873)

PURVIS & CO. PLLC P.O. Box 2307 Gulfport MS 39505 Telephone: 228-206-7174

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CERTIFICATE OF SERVICE

I, Jason B. Purvis, of the law firm of Purvis & Co. PLLC, hereby certify that, on this day, I electronically filed the foregoing pleading or other paper with the Clerk of the Court via the ECF system which provides service on all counsel of record. Persons not participating in ECF/MEC have been served by other means as indicated below for each (if any):

None

So certified on this, the 19th day of September, 2017.

/s/ Jason B. Purvis

Jason B. Purvis (MSB #100873)

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